IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTONIO MANNING, (01),

[DOB: 09/03/2001],

SHERON LAMONT MANNING, (03),

[DOB: 02/28/2003],

MICHAEL DEWAYNE HARDY, (04),

[DOB: 07/08/2002], and

FEDO ANTONIA MANNING, (05),

[DOB: 03/02/2001]

Defendants.

Case No. 23-00111-01/04-CR-W-BP

COUNT ONE:

(Conspiracy to Traffic Firearms)

All Defendants

18 U.S.C. §§ 933(a)(1), (3), and (b)

NMT: 15 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNT TWO:

(Engaging in Firearm Sales Without a License)

All Defendants

18 U.S.C. §§ 922(a)(1)(A), 923(a), and

924(a)(1)(D)

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class D Felony

COUNTS THREE, FIVE, SIX, SEVEN, NINE, ELEVEN, THIRTEEN, FOURTEEN, and

SIXTEEN:

(Trafficking Firearms)

Ct. 3, 5, 6 – Defendant Antonio Manning

Ct. 7 – Defendant Michael Hardy

Ct. 9, 11, 13, 14, 16 - Defendant Sheron Manning

18 U.S.C. §§ 933(a)(1) and (b) NMT: 15 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNTS FOUR, EIGHT, TEN, TWELVE, FIFTEEN, and SEVENTEEN:

(Possession of an Unregistered Machinegun)

Ct. 4 – Defendant Antonio Manning

Ct. 8 – Defendant Michael Hardy

Ct. 10, 12, 15, 17 – Defendant Sheron Manning

26 U.S.C. §§ 5861(d), 5871, and 5845

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNTS EIGHTEEN TO TWENTY- SEVEN:

(Making a False Statement on ATF Form 4473) Defendant Fedo Antonia Manning

18 U.S.C. §§ 922(a)(6) and 924(a)(2)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release \$100 Mandatory Special Assessment

Class C Felony

FORFEITURE ALLEGATION

All Defendants

18 U.S.C. § 934

\$100 Mandatory Special Assessment For Each Count

Defendant	Name	Counts
1	ANTONIO MANNING	1, 2, 3-6, FA
3	SHERON LAMONT MANNING	1, 2, 9 -17, FA
4	MICHAEL DEWAYNE HARDY	1, 2, 7, 8, FA
5	FEDO ANTONIA MANNING	1. 2. 18-27. FA

SUPERCEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

<u>COUNT ONE</u> (Conspiracy to Traffic Firearms)

Between on or about, May 11, 2022, and April 20, 2023, said dates being approximate, in the Western District of Missouri and elsewhere, the defendants, ANTONIO MANNING, DEJOHUAN MIETZ HUNTLEY, SHERON LAMONT MANNING, MICHAEL DEWAYNE HARDY, and FEDO ANTONIA MANNING, knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit the following firearms:

- A Glock, Model 19, 9mm caliber, handgun, bearing Serial Number BKHR170;
- A Glock, Model 17, 9mm caliber, handgun, bearing Serial Number AARD738;
- A Glock, Model 23, .40 caliber, handgun, bearing Serial Number BUGF363;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022202;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022226;
- A Romar/Cugir, Mini Draco, 7.62 x 39 caliber, pistol, bearing Serial Number ROA 22 PG-3659;
- A Century Arms, Model "VSKA," 7.62 x 39 caliber, pistol, bearing Serial Number SV7P008760;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022225;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022215;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22021785;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 21412257;

- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22094913;
- A Glock, Model 22, Model 22, .40 caliber, pistol, bearing Serial Number XCD938;
- A Glock, Model 19, 9mm caliber, pistol, bearing Serial Number BHCR180;
- A Glock, Model 41, .45 caliber, pistol, bearing Serial Number YWE140;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing an obliterated Serial Number;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22108192;
- A Glock, Model 22, .40 caliber, pistol, bearing Serial Number BWTM124;
- A Glock, Model 23, .40 caliber, pistol, bearing Serial Number ZLZ965;
- A Glock, Model 19, 9mm caliber, pistol, bearing Serial Number BKPX144;
- A Glock, Model 17, 9mm caliber, pistol, bearing Serial Number BKUB535; and
- A Glock, Model 22, .40 caliber, pistol, bearing Serial Number MYR680

to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1), (3) and (b).

COUNT TWO (Engaging in Firearm Sales Without a License)

Between on or about, May 11, 2022, and April 20, 2023, said dates being approximate, in the Western District of Missouri and elsewhere, the defendants, ANTONIO MANNING, DEJOHUAN MIETZ HUNTLEY, SHERON LAMONT MANNING, MICHAEL DEWAYNE HARDY, and FEDO ANTONIA MANNING, none being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in

the business of dealing in firearms, contrary to the provisions of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT THREE (Trafficking Firearms)

On or about the July 21, 2022, in the Western District of Missouri, the defendant, **ANTONIO MANNING**, did ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit:

- A Glock, Model 19, 9mm caliber, handgun, bearing Serial Number BKHR170;
- A Glock, Model 17, 9mm caliber, handgun, bearing Serial Number AARD738;
- A Glock, Model 23, .40 caliber, handgun, bearing Serial Number BUGF363;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022202; and
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022226

to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

<u>COUNT FOUR</u> (Possession of an Unregistered Machinegun)

On or about July 21, 2022, in the Western District of Missouri, the defendant, **ANTONIO MANNING**, knowingly possessed a firearm, that is, a Glock, Model 23, .40 caliber, handgun, bearing Serial Number BUGF363, that had been altered into a machinegun, which was not then registered to him in the National Firearms Registration and Transfer Record, all in violation of Title 26, United States Code, Sections 5861(d), 5871 and 5845.

<u>COUNT FIVE</u> (Trafficking Firearms)

On or about the August 11, 2022, in the Western District of Missouri, the defendant, **ANTONIO MANNING**, did ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit:

- A Romar/Cugir, Mini Draco, 7.62 x 39 caliber, pistol, bearing Serial Number ROA 22 PG-3659:
- A Century Arms, Model "VSKA," 7.62 x 39 caliber, pistol, bearing Serial Number SV7P008760;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022225; and
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022215;

to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

<u>COUNT SIX</u> (Trafficking Firearms)

On or about the September 8, 2022, in the Western District of Missouri, the defendant, **ANTONIO MANNING**, aiding and abetting another individual known to the grand jury, did ship, transport, transfer, cause to be transported, or otherwise dispose of firearms, to wit:

- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22021785;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 21412257;

to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1), (b) and Section 2.

<u>COUNT SEVEN</u> (Trafficking a Firearm)

On or about the September 20, 2022, in the Western District of Missouri, the defendant, MICHAEL DEWAYNE HARDY, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Glock, Model 19, 9mm caliber, pistol, bearing Serial Number BHCR180, that had been altered into a machinegun, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

<u>COUNT EIGHT</u> (Possession of an Unregistered Machinegun)

On or about September 20, 2022, in the Western District of Missouri, the defendant, **MICHAEL DEWAYNE HARDY**, knowingly possessed a firearm, that is, a Glock, Model 19, 9mm caliber, pistol, bearing Serial Number BHCR180, that had been altered into a machinegun, which was not then registered to him in the National Firearms Registration and Transfer Record, all in violation of Title 26, United States Code, Sections 5861(d), 5871 and 5845.

<u>COUNT NINE</u> (Trafficking a Firearm)

On or about the November 18, 2022, in the Western District of Missouri, the defendant, **SHERON LAMONT MANNING**, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Glock, Model 41, .45 caliber, pistol, bearing Serial Number YWE140, that had been altered into a machinegun, to another person in or otherwise

affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

<u>COUNT TEN</u> (Possession of an Unregistered Machinegun)

On or about November 18, 2022, in the Western District of Missouri, the defendant, **SHERON LAMONT MANNING**, knowingly possessed a firearm, that is, a Glock, Model 41, .45 caliber, pistol, bearing Serial Number YWE140, that had been altered into a machinegun, which was not then registered to him in the National Firearms Registration and Transfer Record, all in violation of Title 26, United States Code, Sections 5861(d), 5871 and 5845.

COUNT ELEVEN (Trafficking a Firearm)

On or about the January 3, 2023, in the Western District of Missouri, the defendant, SHERON LAMONT MANNING, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: an Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing an obliterated Serial Number, that had been altered into a machinegun, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

<u>COUNT TWELVE</u> (Possession of an Unregistered Machinegun)

On or about January 3, 2023, in the Western District of Missouri, the defendant, **SHERON LAMONT MANNING**, knowingly possessed a firearm, that is, an Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing an obliterated Serial

Number, that had been altered into a machinegun, which was not then registered to him in the National Firearms Registration and Transfer Record, all in violation of Title 26, United States Code, Sections 5861(d), 5871 and 5845.

COUNT THIRTEEN (Trafficking a Firearm)

On or about the April 6, 2023, in the Western District of Missouri, the defendant, SHERON LAMONT MANNING, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: an Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22108192, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

COUNT FOURTEEN (Trafficking a Firearm)

On or about the April 10, 2023, in the Western District of Missouri, the defendant, SHERON LAMONT MANNING, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Glock, Model 22, .40 caliber pistol, bearing Serial Number BWTM124, that had been altered into a machinegun, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

<u>COUNT FIFTEEN</u>

(Possession of an Unregistered Machinegun)

On or about April 10, 2023, in the Western District of Missouri, the defendant, SHERON **LAMONT MANNING**, knowingly possessed a firearm, that is, a Glock, Model 22, .40 caliber, pistol, bearing Serial Number BWTM124, that had been altered into a machinegun, which was not then registered to him in the National Firearms Registration and Transfer Record, all in violation of Title 26, United States Code, Sections 5861(d), 5871 and 5845.

COUNT SIXTEEN

(Trafficking a Firearm)

On or about the April 17, 2023, in the Western District of Missouri, the defendant, SHERON LAMONT MANNING, did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Glock, Model 23, .40 caliber, pistol, bearing Serial Number ZLZ965, that had been altered into a machinegun, to another person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

<u>COUNT SEVENTEEN</u> (Possession of an Unregistered Machinegun)

On or about April 17, 2023, in the Western District of Missouri, the defendant, SHERON **LAMONT MANNING**, knowingly possessed a firearm, that is, a Glock, Model 23, .40 caliber, pistol, bearing Serial Number ZLZ965, that had been altered into a machinegun, which was not then registered to him in the National Firearms Registration and Transfer Record, all in violation of Title 26, United States Code, Sections 5861(d), 5871 and 5845.

<u>COUNTS EIGHTEEN TO TWENTY-SEVEN</u> (Making a False Statement on ATF Form 4473)

On or about the dates listed below for the specific counts, in the Western District of Missouri, the defendant, FEDO ANTONIA MANNING, in connection with the acquisition and attempted acquisition of the firearms listed below for the specific counts ("firearms"), from dealers listed below for the specific counts ("FFLs" or "dealers"), all of which were licensed dealers of firearms within the meaning of Chapter 44 Title 18, United States Code, knowingly made a false and fictitious written statement to each of the dealers, which statement was intended and likely to deceive each dealer, as to a fact material to the lawfulness of such sales and acquisition of the firearms to the defendant under chapter 44 of Title 18, United States Code, in that the defendant falsely represented on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 that in response to Question 21.a, that the defendant was the actual transferee/buyer of each firearm listed on each form and these statements and representations by the defendant were completely false, as the defendant well knew.

Count	<u>Date</u>	<u>Dealer</u>	<u>Firearms</u>
18	5/11/2022	FFL #1, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22023366
19	5/21/2022	FFL #1, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22023353
20	5/22/2022	FFL #1, Lee's Summit, Missouri	Glock, Model 48, 9mm pistol, bearing serial number BWMK796
21	5/22/2022	FFL #1, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22023357
22	5/26/2022	FFL #2, Kansas City, Missouri	Anderson Manufacturing, AM-15 receiver, Multi caliber, bearing serial number 21404462
23	5/26/2022	FFL #2, Kansas City, Missouri	Anderson Manufacturing, AM-15 receiver, Multi caliber, bearing serial number 21404472
24	7/19/2022	FFL #1, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22022225
25	8/7/2022	FFL #1, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22022235

26	8/7/2022	FFL #1, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22022228
27	1/13/2023	FFL #2, Kansas City, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22108192

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATION

The allegations contained in Counts 1, 3, 5, 6, 7, 9, 11, 13, 14, and 16, above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 934.

As a result of committing the firearms trafficking offenses alleged in Counts 1, 3, 5, 6, 7, 9, 11, 13, 14, and 16 of this Indictment, ANTONIO MANNING, SHERON LAMONT MANNING, MICHAEL DEWAYNE HARDY, and FEDO ANTONIA MANNING, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 934, any and all property constituting, or derived from, any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to a forfeiture money judgment representing proceeds the defendants personally obtained, directly and indirectly, as a result of their participation in the firearms trafficking offenses alleged in Counts 1, 3, 5, 6, 7, 9, 11, 13, 14, and 16.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

04/02/2024 /s/Kimberley Deardorff

DATE FOREPERSON OF THE GRAND JURY

/s/William A. Alford III

William A. Alford III
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit One
Western District of Missouri